

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania



United States of America

v.

Terrence Marche

Case No.

21-MJ-1425

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ in the county of _____ Montgomery in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section
 18 USC 1073

Offense Description
 Unlawful Flight to Avoid Prosecution

This criminal complaint is based on these facts:
 See attached affidavit.

☐ Continued on the attached sheet.

 /S/ Zachariah Miller

Complainant's signature

 TFO Zachariah Miller

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/16/2021

 /S/ Carol S. Moore Wells

Judge's signature

City and state: Philadelphia, Pennsylvania

 Carol S. Moore Wells, U.S. Magistrate Judge

Printed name and title

A F F I D A V I T

I, Zachariah Miller, do depose and state as follows:

1. I am a Deputy Sheriff with the Montgomery County Sheriff's Office and have been so employed for the past 11 years. I am also deputized as a Special Deputy United States Marshal authorized to investigate violations of Title 18 of the United States Code and am currently assigned to the Federal Bureau of Investigation's Safe Streets Task Force.
2. I am currently assigned to the investigation of Terrence Marche and his unlawful flight from the Commonwealth of Pennsylvania to avoid prosecution. The information contained in this affidavit is based on my personal knowledge and on information provided to me by other agents and law enforcement officers involved in this investigation as well as various public and private databases.
3. The investigation into Marche began upon on November 28, 2020, when the Lansdale Police Department (LPD) was dispatched to a vehicle accident and report of shots fired in Lansdale Pennsylvania. LPD arrived and located a Nissan Sentra resting against a light standard on the northwest corner of E. Hancock Street and Church Road. Responding officers located the vehicle, and observed an unresponsive female driver, identified as Ebony Sequita Pack. The Nissan Sentra had bullet strikes on the driver's side door, and the engine was running.
4. Pack was transported to Abington-Lansdale Hospital Jefferson Health by ambulance where she was pronounced dead at 10:24 PM. On November 30, 2020, a Forensic Pathologist conducted an autopsy on the body of Ebony Pack. Following the autopsy, the pathologist opined the cause of death was multiple gunshots and ruled the manner of death as a homicide.
5. Through the course of this investigation, detectives determined bullets used in this homicide were specific to a 9 mm bullet produced by Kings Shooter Supply, a gun store in Upper Merion Township.
6. Detectives identified and collected video surveillance from the area. Video surveillance depicts the victim's vehicle traveling westbound on E. Hancock Street, followed by a second vehicle. At 9:56:18 PM, the victim's vehicle stops at the intersection of E. Hancock Street and Church Road for a red signal. At 9:56:26 PM, the second vehicle pulls up next to the victim's vehicle, alongside the victim's driver's side door. At 9:56:32 PM, the second vehicle drives away, traveling southbound on Church Road. Meanwhile, the victim's vehicle slowly rolls through the intersection to where it came to rest against the light standard at 9:56:44 PM. These were the only two vehicles at the intersection at the time of the shooting.
7. On November 28 and November 29, 2020, Detectives interviewed two witnesses who reside in the area. Both witnesses reported hearing multiple gunshots on the evening of

November 28. After hearing the shots, both witnesses observed a dark colored sedan, believed to be a Cadillac, driving southbound on Church Road at a high rate of speed.

8. As part of this investigation, detectives interviewed the victim's girlfriend, Jasmine Stokes. Stokes resides approximately one-half of a mile from the crime scene. Stokes stated she began dating the victim in July 2020. She further explained that every evening, the victim travels to Stokes' residence, arriving approximately between 9:00 PM and 10:00 PM.
9. Around the time she began dating the victim, Stokes broke up with her ex-boyfriend, Chong Ling Dan, age 49. Stokes stated Dan was aware of her relationship with the victim, and he referred to the victim as "that dyke." Stokes further stated Chong Dan knew the type of vehicle the victim operated.
10. Stokes reported that, since the relationship ended, Dan has been abusive and harassing towards her. Stokes described an incident that occurred on August 4, 2020 at a gas station located on Ridge Ave in Philadelphia. Stokes was pumping gas into her vehicle when Dan exited a tinted, red Jeep Grand Cherokee. Dan "jumped" into her vehicle, locked the doors, and began emptying her purse and asking for his money. Stokes stated Dan then unlocked the doors, and she was able get into the front passenger seat of her vehicle. Dan drove off, and Stokes crawled into the back seat where she called a friend. Believing she was calling the victim Ebony Pack, Stokes recalled Dan said either, "I'm gonna fix her" or "I have something for her." At that time, Stokes did not believe that to be a direct threat to Ebony Pack. As a result of this incident, Stokes obtained a Protection From Abuse Order against Chong Dan in Montgomery County.
11. Jasmine Stokes also stated that sometime in July 2020, Chong Dan provided Stokes with nineteen thousand dollars in cash for her to "hold on to" for him. Stokes stated she eventually returned only ten thousand dollars to Dan, keeping and spending the other nine thousand dollars.
12. Prior to the shooting on Saturday, November 28, 2020, Stokes stated she spoke to the victim by phone. The victim informed Stokes she was "ten minutes away" from her residence. When the victim did not arrive, Stokes began repeatedly calling the victim's phone, but her calls went unanswered.
13. Through this investigation, detectives learned that the victim left her mother's residence in Feasterville, Bucks County, to travel to Jasmine Stokes' residence on November 28. According to records from the Pennsylvania Turnpike Commission, the victim entered the Pennsylvania Turnpike at the Bensalem Plaza on November 28, 2020 at 21:27:47 and exited at the Fort Washington Plaza at 21:42:13.
14. On Tuesday, January 12, 2021, detectives executed a search warrant on the Pennsylvania Turnpike Commission for a list of registrations that entered and exited the turnpike at approximately the same time as the victim. Detectives received and reviewed records from the Pennsylvania Turnpike Commission pursuant to the aforementioned search

warrant. The records reflected that a dark colored Cadillac sedan bearing a Delaware paper registration XE780753 entered the Bensalem Plaza at 21:27:51, directly behind Ebony Pack's vehicle. This same vehicle exited at the Fort Washington Plaza at 21:42:18, again directly behind Ebony Pack's vehicle. The distance between these two plazas is approximately thirteen (13) miles. These records contained digital images of the front and rear of the Cadillac following the victim. These images revealed the front and the rear of the Cadillac displayed a license plate holder stated, "Royal Car Center." Detectives determined the Delaware paper registration XE780753 was counterfeit.

15. The Royal Car Center, Inc., is a car dealership located at 3950 E. Roosevelt Blvd, Philadelphia. On Wednesday, January 20, 2021, Detectives learned from the staff of Royal Car Center that a 2014 Cadillac ATS, four-door sedan, VIN 1G6AA5RX4E0101101, was sold to a male named Ricky Vance. This vehicle purchase was brokered through Kelly Motorcars, 2880 Bergey Road, Suite Q, Hatfield, PA, and the purchase date was October 1, 2020. The staff of Royal Car also indicated this Cadillac was the only Cadillac ever sold with a front license plate with their company's insignia.
16. On Wednesday, January 20, 2021, Detectives met with the staff of Kelly Motorcars and was provided a copy of the bill of sale for this purchase. At the time of the purchase, Pennsylvania registration LCB-3189 was issued for the vehicle. During the purchase, Ricky Vance provided a copy of his Pennsylvania Driver's License, listed his address as 2266 Ruffner Street, Philadelphia, PA, and provided a cellular telephone number of 267-726-1739.
17. A search was conducted for cellular phone number 267-726-1739, and it was discovered the phone is currently subscribed through T-Mobile under the name Ricky Vance. The records for this phone number revealed Vance also had a second cellphone number under his name with T-Mobile, 267-770-1727.
18. On Thursday, February 11, 2021, Detectives interviewed Ricky Vance. Vance stated he was operating his Cadillac on the evening of November 28. However, he denied ever driving his vehicle on the Turnpike, claiming he never left Philadelphia on the night of the homicide. In his interview, Vance stated he placed an aftermarket Cadillac emblem on his Cadillac. This emblem, along with the Royal Car Center license plate, is clearly visible in the surveillance photographs from the Pennsylvania Turnpike. In addition, Vance confirmed his cellphone number is 267-726-1739 with T-Mobile, but he denied having any other phone numbers or accounts in his name. This is contradicted by records from T-Mobile indicating multiple cell phone numbers in his name.
19. Vance stated on the night of the homicide, he was in his Cadillac alone and went to a friend named Nate Fisher's residence to watch a Mike Tyson boxing event. Vance stated Fisher's residence was located in the 400 block of Penn Street, Philadelphia. Initially, Vance claimed he was at Fisher's all night and did not leave the residence at all. He then changed his story, claiming he may have left to meet some friends, also in the city of Philadelphia.

20. On February 17, 2021, Detectives interviewed Nate Fisher and his girlfriend Stella Jenkins, who both reside in the 400 block of Penn Street, Philadelphia. Both confirmed they hosted a gathering in the evening hours of November 28, 2020 to watch the Mike Tyson fight. However, both Fisher and Jenkins told detectives Vance was not present on the evening of November 28, 2020.
21. In his interview, Vance denied placing fraudulent Delaware registrations on his vehicles. Vance's Samsung cellphone was downloaded as part of this investigation. On the phone, a photograph of a Philadelphia Municipal Court Traffic Summons was found. The summons is in Vance's name for a vehicle bearing Delaware temporary registration XF702749. Another photograph showed a Pennsylvania title for a 2003 Mercedes Benz in the name of Curtis Johnson which was titled on March 13, 2020. Records obtained from the Philadelphia Police Department for the vehicle stop which occurred on September 27, 2020 in the 600 block of W Leigh Ave Philadelphia, PA at 7:50 PM identified Vance as the operator and owner of a 2003 Mercedes Benz that displayed a fraudulent Delaware paper registration tag. The Vehicle Identification Number (VIN) listed for the vehicle matched the VIN in the photograph on Vance's phone. A recent records check of that VIN demonstrated the vehicle was currently registered in Vance's name and address.
22. In addition, detectives located text message communications between Vance's cellphone and a contact listed as "Terrence Black," phone number 267-694-3930, on Vance's phone. This text communication occurred on July 1, 2020. Vance requested a "tag...sixty days." The response from "Terrence Black's" cellphone advised Vance the tags were only for 30 days. Detectives identified "Terrence Black" as Terrence Marche.
23. The information Vance provided in his interview is refuted by evidence gathered by detectives throughout this investigation. His denial that he ever drove his vehicle on the turnpike is clearly refuted by the images of Vance's black Cadillac entering and exiting the Pennsylvania Turnpike directly behind Ebony Pack. Although he claims to have only one cellphone account with T-Mobile, cell phone records confirm Vance has multiple cellphone accounts with T-Mobile in his name including 267-726-1739, 267-770-1727, and 267-748-4678. He denied having ever placed fraudulent Delaware registrations on his vehicles; however, police records confirm that he was driving a vehicle with a fraudulent Delaware paper registration tag on September 27, 2020. Finally, he claims to have been at Nate Fisher's house on the evening of the homicide; however, Fisher and his girlfriend deny that Vance was at their residence on that date.
24. On Tuesday, March 16, 2021, Detectives interviewed Lakia Robinson, Ricky Vance's girlfriend. Ms. Robinson stated Ricky Vance had been living with her for approximately one year. She stated Ricky's cars are important to him and Vance would not allow someone else to operate them. Ms. Robinson stated on Sunday, November 29, 2020, Vance's Cadillac was parked outside their shared residence. Ms. Robinson initially lied to detectives and stated on Sunday, November 29, 2020, she and Vance traveled to the King of Prussia Mall and did not visit with Terrence Marche. When confronted with phone

record results, Robinson stated she and Vance drove to visit Terrence Marche at Marche's apartment on that Sunday. Ms. Robinson stated Ricky Vance and Terrence Marche were having a conversation in Marche's apartment, however, she did not know what they were talking about.

25. On Thursday, February 11, 2021, pursuant to a search warrant, Ricky Vance's Cadillac bearing Pennsylvania registration LCB-3189 was seized and transported to the Lansdale Police Department where it was securely stored as evidence. On Friday, February 12, 2021, Detectives searched and processed Ricky Vance's Cadillac ATS for any evidence pertaining to the murder of Ebony Pack which included gunshot residue testing. These trace evidence samples were submitted to the Pennsylvania State Police crime lab for analysis.
26. On Thursday, April 15, 2021, Detectives received the trace evidence report from the Pennsylvania State Police, Bureau of Forensic Services that indicated gunshot residue was detected on Ricky Vance's Cadillac ATS. Specifically, one (1) particle characteristic of gunshot residue, defined as being composed of the elements lead, barium and antimony, was identified from the interior of passenger side of the Cadillac. Particles that were indicative of gunshot residue, defined as one or two of these elements, were identified on both the interior driver's and passenger areas of the Cadillac. This evidence is consistent with Ricky Vance's Cadillac pulling alongside the victim's vehicle and a passenger inside of Vance's Cadillac firing shots, as depicted in the video surveillance noted above in paragraph 6.
27. On Wednesday, March 3, 2021, Detectives interviewed Terrence Marche. Marche stated he has two cellular phone numbers, 267-694-3930 and 267-469-3129, one which is personal and one for his business. Marche stated he has had a close relationship with Ricky Vance for over ten years. Marche admitted that he provided Vance a Pennsylvania in-transit paper tag sometime in the summer of 2020 but denied providing him any counterfeit paper tags.
28. Marche also told detectives he is friends with Chong Ling Dan and has known Dan for approximately thirty-years. Marche stated he did not believe Vance and Dan know each other. Marche stated he was at "Jasmine's house in Lansdale with Dan sometime last summer." Marche denied any involvement in the murder of Ebony Pack and stated he "was home all night" on the evening of November 28, 2020.
29. During his interview, Terrence Marche admitted that he had been inside Kings Shooter Supply gun store sometime in December 2020 to "look around." Marche is not permitted by law to purchase or possess a firearm. In addition, detectives determined bullets used in this homicide were specific to a 9 mm bullet produced by Kings Shooter Supply.
30. Detective William Mitchell, an expert in the field of Historical Call Detail Records Analysis, analyzed the cellphone records of Chong Dan, Ricky Vance, and Terrance Marche. Detective Mitchell found all three individuals' cellphones travel from different locations to the area of East Mount Airy/Germantown section of Philadelphia, PA just

after 7:50 PM on November 28, 2020. This area is significant because Terra Ammons, one of Chong Dan's girlfriend resides on the 500 block of Mayland Street in this same section of Philadelphia, PA.

31. Specifically, Terrance Marche's cellphone(s) leave the area of his residence in King of Prussia, PA after 4:00 PM on November 28, 2020 and traveled to the area of Center City Philadelphia, PA and then traveled back to the area of his residence. At 6:54 PM, Marche's cellphone (267-694-3930) makes an outgoing call to Vance's cellphone for 19 seconds. After this call to Vance, Marche's cellphone left the area of his residence and traveled to the area of East Mount Airy/East Germantown sections of Philadelphia, PA which was the area of Dan's girlfriend's residence. There was a lack of voice or text activity for Marche's cellphone(s) until after the homicide occurred. At 10:25 PM, Marche's cellphone (267-694-3930) made an outgoing call to Vance's cellphone which lasted 29 seconds. Marche's cellphone (267-694-3930) then received an incoming call from Vance's cellphone at 10:26 PM lasting 37 seconds. Marche's cellphone (267-694-3930) was accessing cell sites just south of the previous cell sites in the area of East Mount Airy/East Germantown sections of Philadelphia, PA for these calls. Marche's phone then traveled in a southern direction towards the area of Vance's residence and made an outgoing call to Vance's cellphone at 10:54 PM but the call had no duration.
32. Ricky Vance's cellphone is in the area of his residence on North 31st Street in Philadelphia, PA, when his phone received the call from Marche's cellphone at 6:54 PM. Vance's cellphone then left the area of his residence on 31st Street and traveled to the area of East Mount Airy/East Germantown sections of Philadelphia, PA. Vance's cellphone made an outgoing call to Marche's cellphone at 7:53 PM for 23 seconds. Following that outgoing call there was no more outgoing activity for Vance's cellphone until after the homicide occurred. Vance's cellphone received several incoming voice calls between 7:53 PM and 8:20 PM which were directed to voicemail and one incoming text message which was unanswered. There was a period of voice and text inactivity from 8:20 PM until 10:15 PM. At 10:15 PM, Vance's cellphone received another incoming call which was routed to voicemail. The first answered activity for Vance's cellphone after the homicide was the incoming call from Marche's cellphone at 10:25 PM and the first outgoing activity for the cellphone was the call to Marche's cellphone at 10:26 PM. Vance's cellphone then traveled south to the area of his residence on 31st Street and was accessing a cell site in that area at 11:08 PM. The cellphone then traveled to the area of his other residence on Ruffner Street and was accessing a cell site in that area at 11:30 PM for an outgoing call to Marche's cellphone that lasted 11 seconds.
33. A total of 200 communications were found between Marche's cellphone (267-694-3930) and Vance's cellphone between from July 1, 2020 and March 11, 2021 with the last communication on this phone number being February 17, 2021. A total of 57 communications were found between Marche's 2nd cellphone (267-469-3129) during the same time period, most of which occurred after November 28, 2020, and the last being February 17, 2021. Vance also had multiple contacts with Marche's second phone number of 267-469-3129 in the days before and after the homicide occurred.

34. Chong Dan's cellphone was accessing a cell site in the area of Cheltenham Township, Montgomery County, PA, at 4:38 PM and moved in a western direction towards the area of his girlfriend Terra Ammons' residence in the area of East Mount Airy/East Germantown sections of Philadelphia, PA. The cellphone remained in the area until just after 8:30 PM, last accessing a cell site in this area at 8:38 PM. The cellphone traveled in a southern direction and accessed a cell site in the area of 600 Righters Ferry Rd, Bala Cynwyd, PA at 8:48 PM. There was a large amount of texting activity that did not contain cell site information between 8:48 PM and 11:34 PM. At 11:34 PM, Chong Dan's cellphone was accessing a cell site in the area of Springdale, NJ.
35. In addition to cellphone records, Detective William Mitchell received records from Google in reference to Terrence Marche and Ricky Vance's cellphones. Google users have the option to track and store the location history of their cellular phone handset which is stored in Google's Sensorvault. Ricky Vance's Google account is listed under email rickgees68@gmail.com and Marche's Phone Number: +12676943930 [US] are listed under qaadirhuss@gmail.com and User Phone Numbers: +12674693129 [US] is listed under terrencemarche@gmail.com. Records were received for Vance's cellphone and Marche's cellphone number 267-694-3930.
36. An analysis of these records demonstrated Terrence Marche's cellphone traveled to the area of the victim's residence in Feasterville-Trevose, PA on September 24, 2020 and September 25, 2020. After each trip, Marche's cellphone then traveled to the area of Dan's girlfriend Terra Ammons' residence in the East Mount Airy/East Germantown section of Philadelphia. Around the times Marche traveled to the area of the victim's residence, Marche's cellphone had multiple communications with Vance's cellphone.
37. On November 27, 2020, the night before the homicide, between 8:15 PM and 10:35 PM, both Vance and Marche's location history shows they traveled to the area of Clearview St and E Gorgas St in Philadelphia, PA. This location is in the same area of Dan's girlfriend Terra Ammon's residence in the East Mount Airy/East Germantown section of Philadelphia.
38. On the evening of the homicide, November 28, 2020, just after 7:00 PM, Vance's location history shows his cellphone traveled from the area of his residence to the area of Clearview St and E Gorgas Ln in Philadelphia, PA. During this same timeframe, Marche's cellphone left the area of his residence and traveled to the same location as Vance's cellphone. Both cellphones remained in the area of Clearview St and E Gorgas Ln during the time of the homicide and did not have any outgoing activity as previously described.
39. On November 28, 2020 between 7:06 PM and 7:39 PM, Chong Dan's cell site usage demonstrated his cellphone began using a cell site in the area of Terra Ammons' residence and ended using a cell site in the area where Marche and Vance's cellphones were located. This indicated that Chong's cellphone left the area of Terra Ammon's residence and traveled in a western direction towards the area where Marche and Vance's cellphones were located.

40. Just after the homicide and after outgoing communication resumed on Marche and Vance's cellphones at 10:25 PM and 10:26 PM, their Google location history indicated both phones traveled in a southern direction towards the area of Vance's residence. Vance's location history demonstrated his cellphone returned to his residence, and Marche's cellphone travels to the parking lot area of the Gillin Boathouse adjacent to the Schuylkill River, located in the 2200 block of Kelly Drive, Philadelphia. Marche's cellphone remained in the area from 10:41 PM to 10:51 PM and then traveled back to the area of Marche's residence in King of Prussia, PA.
41. The day after the homicide, on November 29, 2020 at 4:09 PM, Vance's Google location history demonstrated his cellphone departed the area of his residence and traveled directly to the area of Marche's apartment in King of Prussia, PA, arriving at 4:42 PM. The cellphone remains in this area until 4:51 PM, when the location history shows the cellphone returned directly to the area of his residence in Philadelphia.
42. Based on his analysis of the cellphone records of Chong Dan, Ricky Vance and Terrance Marche and the Google location records of Ricky Vance and Terrance Marche, Detective Mitchell concluded that on November 28, 2020, prior to the homicide, all three individuals' cellphones traveled to the same area in East Mount Airy/East Germantown, not far from the residence of Dan's girlfriend. Vance and Marche's cellphones were in communication with each other just prior to when their cellphones began moving to that area. After arriving in East Mount Airy/East Germantown, Vance and Marche's cellphones had periods of outgoing voice and text inactivity and remained in the same location, near Gorgas & Clearview Street, during the crucial time of the homicide. Vance and Marche's cellphones only resumed voice and text activity after the homicide occurred. Both cellphones then moved in a southern direction. Vance's cellphone returned to the area of his residence. Marche's cellphone traveled to an area adjacent to the Schuylkill River and then returned to the area of his residence. After Marche's cellphone returned to his residence, Marche and Vance's cellphones again communicated with each other, briefly. On November 29, 2020, the day after the homicide, Vance traveled directly to the area of Marche's residence, stayed for a brief period of time, and then returned directly to the area of his residence.
43. During the week of May 17, 2021, Detectives learned that Terrance Marche departed the country for Honduras in Mid-April 2021 and "went missing." On Friday, May 21, 2021, Detectives interviewed Twana Miller, Terrence Marche's fiancé. Twana Miller stated she drove Marche to the Philadelphia airport sometime in mid-April, 2021, believing he was flying to Miami. When they arrived at the airport, Marche then confided in Miller that he was really travelling to Honduras to meet Chong Dan, known to her as "Ling." Miller stated she spoke to Marche regularly while he was in Honduras until he suddenly stopped communicating with her on Sunday, May 16, 2021. Miller stated she received a phone call from Chong Dan on Wednesday, May 19, 2021. During that call, Dan informed Miller that Marche went missing and he was returning to the United States without Marche.

44. Records indicate that Marche traveled from Miami to Honduras on April 13, 2021. To date there is no record of Marche returning to the United States.
45. Records indicate that Dan returned to the United States on May 18, 2021.
46. A criminal history check on Terrence Marche indicated he was arrested on August 22, 1996 and charged federally for Conspiracy to Commit Bank Robbery and Armed Bank Robbery, Use of a Firearm During Crime of Violence and plead guilty to Armed Robbery of Federal Savings Institution on November 5, 1997. Marche was sentenced to one hundred and eighty-eight (188) months in federal custody. Based on this conviction, Marche is precluded from possessing, owning or purchasing a firearm or ammunition.
47. On August 6, 2021, an arrest warrant was obtained for Marche for Murder in the First Degree and related offenses by the Montgomery County Detective Bureau and Lansdale Police. The warrant is attached and incorporated into this affidavit as Attachment A, the criminal complaint as Attachment B.
48. On September 10, 2021, the Montgomery County Assistant District Attorney responsible for extradition matters confirmed that full extradition was authorized for Marche.
49. On September 14, 2021, law enforcement spoke with Miller who advised that she still has had no contact with Marche.
50. Through the investigation, your Affiant believes that Marche has fled the Commonwealth of Pennsylvania and is in Honduras.
51. Based upon the above, your Affiant believes that there is probable cause to believe that Terrence Marche is a fugitive who has traveled in interstate commerce to avoid prosecution in violation of United States Code, Title 18, Section 1073.

/S/ Zachariah Miller
Zachariah Miller
Task Force Officer
Federal Bureau of Investigation

Sworn to and subscribed before me
this 16th day of September, 2021.

/S/ Carol S. Moore Wells
Honorable CAROL S. MOORE WELLS
United States Magistrate Judge

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF MONTGOMERY**Arrest Warrant**

Mag. Dist. No. : MDJ-38-1-28
 MDJ Name : Honorable Edward Levine
 Address : 430-440 Pennbrook Parkway
 Lansdale, PA 19446
 Telephone : 215-393-7534

Commonwealth of Pennsylvania
 v.
 Terrence M. Marche

Complaint No.:	20 16532	Issued For:	Terrence M. Marche
Incident No.:		Docket No:	MJ-38128-CR-0000245-2021
Charging Officer:	Gary, Joseph W.		
Arresting Agency:	Lansdale Boro Police Dept		
Case Filed:	08/06/2021	NCIC OFF:	
OTN:	R 162366-1	OOC:	
Reason For Warrant:	Other (Arrest Warrant)	WARRANT ID:	DIS710496882
Offense Date:	11/28/2020	Warrant Control No:	38128-AW-0000270-2021
Lead Offense:	18 § 2502 §§ A Murder Of The First Degree		

TO THE OFFICER: Joseph W. Gary

In the name of the Commonwealth of Pennsylvania, you are commanded to take the defendant, Terrence M. Marche, into custody. When the defendant is taken into custody, bring the defendant before me at the Court address shown above to answer the complaint charging the defendant with the offense(s) set forth above and further to be dealt with according to law.

Witness the hand and official seal of the issuing authority on this 6th day of August, 2021.

August 06, 2021

Date

Magisterial District Judge McGill



MJ-38128-CR-0000245-2021

38128-AW-0000270-2021

Terrence M. Marche

MDJS 417

Printed: 08/06/2021 10:54:19AM

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FREE INTERPRETER
www.pacourts.us/language-rights
 215-393-7534

Commonwealth of Pennsylvania
v.
Terrence M. Marche

Warrant Control No: 38128-AW-0000270-2021
Docket No: MJ-38128-CR-0000245-2021
OTN: R 162366-1

RETURN WHERE DEFENDANT FOUND

By authority of this warrant, on _____, 20 _____

I took into custody the within named _____, and he/she is

☐ before you for disposition.

☐ In the _____ Prison.

RETURN WHERE DEFENDANT IS NOT FOUND

☐ After careful search, I cannot find the within named defendant.

(Signature of Police Officer - Name and Title)

Service Costs:		Additional Statutorily Authorized Service Costs:	
Warrant	_____	_____	_____
Miles @	_____	_____	_____
Commitments	_____	_____	_____
Miles @	_____	_____	_____
Convey/Transport	_____	_____	_____
Miles @	_____	_____	_____
			Total _____



Commonwealth of Pennsylvania
v.
Terrence M. Marche

Warrant Control No: 38128-AW-0000270-2021
Docket No: MJ-38128-CR-0000245-2021
OTN: R 162366-1

DEFENDANT IDENTIFICATION INFORMATION

LiveScan Tracking Number		Social Security Number 190-58-0472		SID (State Identification Number) 199-62-35-1		FBI Number 703295PA3		
Age 47	Race Black	Ethnicity Non Hispanic	Gender Male	Eye Color Brown	Hair Color Unknown or Completely Bald	Date of Birth 12/28/1973	Weight (lbs) 210	Height(Ft/In) 5' 11"
NCIC Extradition Code / Description: Felony - Full Extradition Unless Otherwise Noted Distance: Comments:								
Alias Terrence Maurice Marche				Participant Local No				
Prosecution Commonwealth of Pennsylvania								
Distinguishing Features/Special Considerations								
DEFENDANT LICENSE / VEHICLE INFORMATION								
License Number 23307488				State PA		Expiration Date		
Plate Number	State	Hazmat	Registration Sticker (MM/YYYY)		Comm'l Veh. Ind.	School Veh.	Oth. Veh. Cd	

DEFENDANT CONTACT INFORMATION

DEFENDANT ADDRESS

Home (Case Address)

3000 Valley Forge Cir
Apt 1340
King Of Prussia, PA 19406

Home

3000 Valley Forge Cir
Apt 1244
King Of Prussia, PA 19406

Other

Usp Lewisburg
Lewisburg, PA



Commonwealth of Pennsylvania
v.
Terrence M. Marche

Warrant Control No: 38128-AW-0000270-2021
Docket No: MJ-38128-CR-0000245-2021
OTN: R 162366-1

All Charge(s)

18 § 2502 §§ A (Lead)	Murder Of The First Degree
18 § 903	Conspiracy - Murder Of The First Degree
18 § 2502 §§ C	Murder Of The Third Degree
18 § 903	Conspiracy - Murder Of The Third Degree
18 § 6105 §§ A1	Possession Of Firearm Prohibited
18 § 907 §§ A	Poss Instrument Of Crime W/Int



COMMONWEALTH OF
PENNSYLVANIA
COUNTY OF: MONTGOMERY



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 38-1-28
MDJ: Hon. EDWARD LEVINE
Address: 430-440 PENNBROOK PARKWAY
LANSDALE, PA 19446-2007
Telephone: (215)393-7534

DEFENDANT:

(NAME and ADDRESS):

TERRENCE

M.

MARCHE

First Name

Middle Name

Last Name

Gen.

3000 Valley Forge Circle, Apt. 1340
King of Prussia, PA. 19406

NCIC Extradition Code Type

- ☒ 1-Felony Full ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States ☐ Distance: _____
☐ 2-Felony Ltd. ☐ 6-Felony Pend. Extradition Determ. ☐ D-Misdemeanor No Extradition
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending
☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition Determ.

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-245-21	Date Filed 08/06/2021	OTN/LiveScan Number R162366-1	Complaint/Incident Number 20-16532	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 12/28/1973	POB PENNSYLVANIA	Add'l DOB / /	Co-Defendant(s) <input checked="" type="checkbox"/>
First Name Middle Name Last Name Gen.				
AKA				
RACE <input type="checkbox"/> White <input type="checkbox"/> Asian <input checked="" type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown				
ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown				
HAIR COLOR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input type="checkbox"/> BRO (Brown) <input checked="" type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input checked="" type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)				
EYE COLOR <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)				
DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location			WEIGHT (lbs.)
FBI Number 703295PA3	MNU Number			210
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO				FL. HEIGHT, In.
Fingerprint Classification				5 11

DEFENDANT VEHICLE INFORMATION

Plate #	State PA	Hazmat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☒ Approved ☐ Disapproved because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

1ST ASSIST. DA EDWARD MCCANN, JR.
(Name of the attorney for the Commonwealth)

Edward F. McCann, Jr.
(Signature of the attorney for the Commonwealth)

08/06/2021
(Date)

I, DET. J. GARY/DET. J. WITTENBERGER
(Name of the Affiant)

5343/29
(PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of LANSDALE BOROUGH PD/MCDB
(Identify Department or Agency Represented and Political Subdivision)
do hereby state: (check appropriate box)

PA0461200
(Police Agency ORI Number)

1. ☒ I accuse the above named defendant who lives at the address set forth above
☐ I accuse the defendant whose name is unknown to me but who is described as _____

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have
therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at **[411]** **E. HANCOCK STREET AND**
(Subdivision Code) (Place-Political Subdivision)
CHURCH ROAD, LANSDALE BOROUGH

in MONTGOMERY **[46]** on or about **SATURDAY, NOVEMBER 28, 2020.**
County (County Code) (Offense Date)

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: 08/06/2021	OTN/LiveScan Number	Complaint/Incident Number 20-16532
Defendant Name	First: TERRENCE	Middle: M.	Last: MARCHE

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
 (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input checked="" type="checkbox"/>	1	2502	A	of the	18	1	H1	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Murder of the First Degree								
Acts of the accused associated with this Offense: Defendant intentionally killed Ebony Pack.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	2	2502	A	of the	18	1	H1	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Conspiracy to Commit Murder of the First Degree								
Acts of the accused associated with this Offense: Defendant conspired with another person(s) to intentionally kill Ebony Pack.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	3	2502	C	of the	18	1	F1	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Murder of the Third Degree								
Acts of the accused associated with this Offense: Defendant killed Ebony Pack.								

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: 08/06/2021	OTN/LiveScan Number	Complaint/Incident Number 20-16532
Defendant Name	First: TERRENCE	Middle: M.	Last: MARCHE

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.
(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input checked="" type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	4	2502	C	of the	18	1	F1	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Conspiracy to Commit Murder of the Third Degree								
Acts of the accused associated with this Offense: Defendant conspired with another person(s) to kill Ebony Pack.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	5	6105	A(1)	of the	18	1	F2	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Person Not to Possess, Use, Manufacture, Control, Sell or Transfer firearm								
Acts of the accused associated with this Offense: Defendant had been convicted of robbery and possessed, used or controlled a firearm.								

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____				
<input type="checkbox"/>	6	907	A	of the	18	1	M1	
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	
Statute Description (include the name of statute or ordinance): Possessing Instruments of Crime								
Acts of the accused associated with this Offense: Defendant possessed an instrument of crime, a firearm, with the intent to employ it criminally.								

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: 08/06/2021	OTN/LiveScan Number	Complaint/Incident Number 20-16532
Defendant Name	First: TERRENCE	Middle: M.	Last: MARCHE

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
4. This complaint consists of the preceding page(s) numbered 1 through 4.
5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

AUGUST 6
(Date)

2021
(Year)

(Signature of Affiant)

AND NOW, on this date

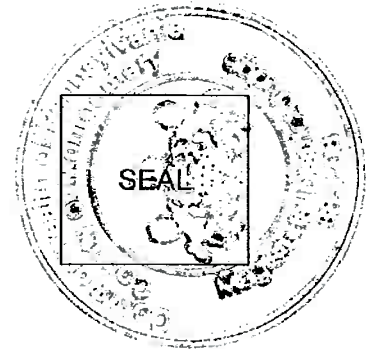
8/6/21

I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

38-1-08
(Magisterial District Court Number)

(Issuing Authority)



**Affidavit of Probable Cause
ARREST WARRANT – TERRENCE MARCHE**

On Saturday, November 28, 2020 at approximately 9:59 PM, officers from the Lansdale Police Department were dispatched to a vehicle accident and reports of “shots fired” in the area of East Hancock Street and Church Road, Lansdale Borough, Montgomery County. Lansdale Police Sergeant Amanda North and Officer Christian Gregory arrived and located a Nissan Sentra resting against a light standard on the northwest corner of E. Hancock Street and Church Road.

Inside the vehicle, officers located the unresponsive female driver, identified as Ebony Sequita Pack, age 30. The Nissan Sentra had bullet strikes on the driver’s side door, and the engine was running. The area of Hancock Street and Church Road was secured as a crime scene. The Lansdale Borough Police Department and the Montgomery County Detective Bureau commenced a joint investigation into this apparent homicide.

Montgomery County Detective Edward Schikel processed the crime scene. Shattered glass and ten (10) fired 9 mm cartridge cases (FCCs) were recovered on East Hancock Street, just east of the intersection of Church Road. Detective Schikel determined Pack’s vehicle traveled ninety-three (93) feet from the cluster of FCCs and shattered glass to where it crashed into the light standard. Through the course of this investigation, detectives determined bullets used in this homicide were specific to a 9 mm bullet produced by Kings Shooter Supply, a gun store in Upper Merion Township.

Pack was transported to Abington-Lansdale Hospital Jefferson Health by ambulance where she was pronounced dead at 10:24 PM by Doctor Marc Leshner. On November 30, 2020, Forensic Pathologist Doctor Khalil Wardak conducted an autopsy on the body of Ebony Pack. Following the autopsy, Doctor Wardak opined the cause of death was multiple gunshots and ruled the manner of death as a homicide.

Detectives identified and collected video surveillance from a camera located on the North Penn School District Educational Building located at 401 E. Hancock Street. This camera is directed at the intersection of E. Hancock Street and Church Road. This video surveillance depicts the victim’s vehicle traveling westbound on E. Hancock Street, followed by a second vehicle. At 9:56:18 PM, the victim’s vehicle stops at the intersection of E. Hancock Street and Church Road for a red signal. At 9:56:26 PM, the second vehicle pulls up next to the victim’s vehicle, alongside the victim’s driver’s side door. At 9:56:32 PM, the second vehicle drives away, traveling southbound on Church Road. Meanwhile, the victim’s vehicle slowly rolls through the intersection to where it

came to rest against the light standard at 9:56:44 PM. These were the only two vehicles at the intersection at the time of the shooting.

On November 28 and November 29, 2020, Montgomery County Detective John Wittenberger and Lansdale Police Detective Joel Greco interviewed two witnesses who reside in the area. Both witnesses reported hearing multiple gunshots on the evening of November 28. After hearing the shots, both witnesses observed a dark colored sedan, believed to be a Cadillac, driving southbound on Church Road at a high rate of speed.

As part of this investigation, detectives interviewed the victim's girlfriend, Jasmine Stokes. Stokes resides approximately one-half of a mile from the crime scene. Stokes stated she began dating the victim in July 2020. She further explained that every evening, the victim travels to Stokes' residence, arriving approximately between 9:00 PM and 10:00 PM.

Around the time she began dating the victim, Stokes broke up with her ex-boyfriend, Chong Ling Dan, age 49. Stokes stated Dan was aware of her relationship with the victim, and he referred to the victim as "that dyke." Stokes further stated Chong Dan knew the type of vehicle the victim operated.

Stokes reported that, since the relationship ended, Dan has been abusive and harassing towards her. Stokes described an incident that occurred on August 4, 2020 at a gas station located on Ridge Ave in Philadelphia. Stokes was pumping gas into her vehicle when Dan exited a tinted, red Jeep Grand Cherokee. Dan "jumped" into her vehicle, locked the doors, and began emptying her purse and asking for his money. Stokes stated Dan then unlocked the doors, and she was able get into the front passenger seat of her vehicle. Dan drove off, and Stokes crawled into the back seat where she called a friend. Believing she was calling the victim Ebony Pack, Stokes recalled Dan said either, "I'm gonna fix her" or "I have something for her." At that time, Stokes did not believe that to be a direct threat to Ebony Pack. As a result of this incident, Stokes obtained a Protection From Abuse Order against Chong Dan in Montgomery County.

Jasmine Stokes also stated that sometime in July 2020, Chong Dan provided Stokes with nineteen thousand dollars in cash for her to "hold on to" for him. Stokes stated she eventually returned only ten thousand dollars to Dan, keeping and spending the other nine thousand dollars.

Prior to the shooting on Saturday, November 28, 2020, Stokes stated she spoke to the victim by phone. The victim informed Stokes she was "ten minutes away" from her residence. When the victim did not arrive, Stokes began repeatedly calling the victim's phone, but her calls went unanswered.

Through this investigation, detectives learned that the victim left her mother's residence in Feasterville, Bucks County, to travel to Jasmine Stokes' residence on November 28. According to records from the Pennsylvania Turnpike Commission, the victim entered the Pennsylvania Turnpike at the Bensalem Plaza on November 28, 2020 at 21:27:47 and exited at the Fort Washington Plaza at 21:42:13

On Tuesday, January 12, 2021, detectives executed a search warrant on the Pennsylvania Turnpike Commission for a list of registrations that entered and exited the turnpike at approximately the same time as the victim. Montgomery County Detective John Wittenberger received and reviewed records from the Pennsylvania Turnpike Commission pursuant to the aforementioned search warrant. The records reflected that a dark colored Cadillac sedan bearing a Delaware paper registration XE780753 entered the Bensalem Plaza at 21:27:51, directly behind Ebony Pack's vehicle. This same vehicle exited at the Fort Washington Plaza at 21:42:18, again directly behind Ebony Pack's vehicle. The distance between these two plazas is approximately thirteen (13) miles. These records contained digital images of the front and rear of the Cadillac following the victim. These images revealed the front and the rear of the Cadillac displayed a license plate holder stated, "Royal Car Center." Detectives determined the Delaware paper registration XE780753 was counterfeit.

The Royal Car Center, Inc., is a car dealership located at 3950 E. Roosevelt Blvd, Philadelphia. On Wednesday, January 20, 2021, Detective Wittenberger and Lansdale Police Detective Joseph Gary learned from the staff of Royal Car Center that a 2014 Cadillac ATS, four-door sedan, VIN 1G6AA5RX4E0101101, was sold to a male named Ricky Vance. This vehicle purchase was brokered through Kelly Motorcars, 2880 Bergey Road, Suite Q, Hatfield, PA, and the purchase date was October 1, 2020. The staff of Royal Car also indicated this Cadillac was the only Cadillac ever sold with a front license plate with their company's insignia.

On Wednesday, January 20, 2021, Detective Wittenberger and Gary met with the staff of Kelly Motorcars and was provided a copy of the bill of sale for this purchase. At the time of the purchase, Pennsylvania registration LCB-3189 was issued for the vehicle. During the purchase, Ricky Vance provided a copy of his Pennsylvania Driver's License, OLN # 22 165 818, listed his address as 2266 Ruffner Street, Philadelphia, PA, and provided a cellular telephone number of 267-726-1739. A records check on Pennsylvania OLN # 22 165 818 confirmed the license number was assigned to Ricky Vance, issued on August 6, 2019, and lists Vance's address as 2266 Ruffner Street, Philadelphia, PA.

A search was conducted for cellular phone number 267-726-1739, and it was discovered the phone is currently subscribed through T-Mobile under the name Ricky Vance. The records for this phone number revealed Vance also had a second cellphone number under his name with T-Mobile, 267-770-1727.

On Thursday, February 11, 2021, Detectives Wittenberger and Gary interviewed Ricky Vance. Vance stated he was operating his Cadillac on the evening of November 28. However, he denied ever driving his vehicle on the Turnpike, claiming he never left Philadelphia on the night of the homicide. In his interview, Vance stated he placed an aftermarket Cadillac emblem on his Cadillac. This emblem, along with the Royal Car Center license plate, is clearly visible in the surveillance photographs from the Pennsylvania Turnpike. In addition, Vance confirmed his cellphone number is 267-726-1739 with T-Mobile, but he denied having any other phone numbers or accounts in his name. This is contradicted by records from T-Mobile indicating multiple cell phone numbers in his name.

Vance stated on the night of the homicide, he was in his Cadillac alone and went to a friend named Nate Fisher's residence to watch a Mike Tyson boxing event. Vance stated Fisher's residence was located in the 400 block of Penn Street, Philadelphia. Initially, Vance claimed he was at Fisher's all night and did not leave the residence at all. He then changed his story, claiming he may have left to meet some friends, also in the city of Philadelphia.

On February 17, 2021, Detective Greg Henry and Detective Michael Crescitelli interviewed Nate Fisher and his girlfriend Stella Jenkins, who both reside in the 400 block of Penn Street, Philadelphia. Both confirmed they hosted a gathering in the evening hours of November 28, 2020 to watch the Mike Tyson fight. However, both Fisher and Jenkins told detectives Vance was not present on the evening of November 28, 2020.

In his interview, Vance denied placing fraudulent Delaware registrations on his vehicles. Vance's Samsung cellphone was downloaded as part of this investigation. On the phone, a photograph of a Philadelphia Municipal Court Traffic Summons was found. The summons is in Vance's name for a vehicle bearing Delaware temporary registration XF702749. Another photograph showed a Pennsylvania title for a 2003 Mercedes Benz in the name of Curtis Johnson which was titled on March 13, 2020. Records obtained from the Philadelphia Police Department for the vehicle stop which occurred on September 27, 2020 in the 600 block of W Leigh Ave Philadelphia, PA at 7:50 PM identified Vance as the operator and owner of a 2003 Mercedes Benz that displayed a fraudulent Delaware paper registration tag. The Vehicle Identification Number (VIN) listed for the vehicle matched the VIN in the photograph on Vance's phone. A recent records check of that VIN

demonstrated the vehicle was currently registered in Vance's name and address.

In addition, detectives located text message communications between Vance's cellphone and a contact listed as "Terrence Black," phone number 267-694-3930, on Vance's phone. This text communication occurred on July 1, 2020. Vance requested a "tag...sixty days." The response from "Terrence Black's" cellphone advised Vance the tags were only for 30 days. Detectives identified "Terrence Black" as Terrence Marche.

The information Vance provided in his interview is refuted by evidence gathered by detectives throughout this investigation. His denial that he ever drove his vehicle on the turnpike is clearly refuted by the images of Vance's black Cadillac entering and exiting the Pennsylvania Turnpike directly behind Ebony Pack. Although he claims to have only one cellphone account with T-Mobile, cell phone records confirm Vance has multiple cellphone accounts with T-Mobile in his name including 267-726-1739, 267-770-1727, and 267-748-4678. He denied having ever placed fraudulent Delaware registrations on his vehicles; however, police records confirm that he was driving a vehicle with a fraudulent Delaware paper registration tag on September 27, 2020. Finally, he claims to have been at Nate Fisher's house on the evening of the homicide; however, Fisher and his girlfriend deny that Vance was at their residence on that date.

On Tuesday, March 16, 2021, Detectives Wittenberger and Gary interviewed Lakia Robinson, Ricky Vance's girlfriend. Ms. Robinson stated Ricky Vance had been living with her for approximately one year. She stated Ricky's cars are important to him and Vance would not allow someone else to operate them. Ms. Robinson stated on Sunday, November 29, 2020, Vance's Cadillac was parked outside their shared residence. Ms. Robinson initially lied to detectives and stated on Sunday, November 29, 2020, she and Vance traveled to the King of Prussia Mall and did not visit with Terrence Marche. When confronted with phone record results, Robinson stated she and Vance drove to visit Terrence Marche at Marche's apartment on that Sunday. Ms. Robinson stated Ricky Vance and Terrence Marche were having a conversation in Marche's apartment, however, she did not know what they were talking about.

On Thursday, February 11, 2021, pursuant to a search warrant, Ricky Vance's Cadillac bearing Pennsylvania registration LCB-3189 was seized and transported to the Lansdale Police Department where it was securely stored as evidence. On Friday, February 12, 2021, Montgomery County Detectives Edward Schikel, Terrence Lewis and Davis Schanes searched and processed Ricky Vance's Cadillac ATS for any evidence pertaining to the murder of Ebony

Pack which included gunshot residue testing. These trace evidence samples were submitted to the Pennsylvania State Police crime lab for analysis.

On Thursday, April 15, 2021, Detective Wittenberger received the trace evidence report from the Pennsylvania State Police, Bureau of Forensic Services that indicated gunshot residue was detected on Ricky Vance's Cadillac ATS. Specifically, one (1) particle characteristic of gunshot residue, defined as being composed of the elements lead, barium and antimony, was identified from the interior of passenger side of the Cadillac. Particles that were indicative of gunshot residue, defined as one or two of these elements, were identified on both the interior driver's and passenger areas of the Cadillac. This evidence is consistent with Ricky Vance's Cadillac pulling alongside the victim's vehicle and a passenger inside of Vance's Cadillac firing shots, as depicted in the video surveillance from the North Penn School District Building.

On Wednesday, March 3, 2021, Detectives Wittenberger and Henry interviewed Terrence Marche. Marche stated he has two cellular phone numbers, 267-694-3930 and 267-469-3129, one which is personal and one for his business. Marche stated he has had a close relationship with Ricky Vance for over ten years. Marche admitted that he provided Vance a Pennsylvania in-transit paper tag sometime in the summer of 2020 but denied providing him any counterfeit paper tags.

Marche also told detectives he is friends with Chong Ling Dan and has known Dan for approximately thirty-years. Marche stated he did not believe Vance and Dan know each other. Marche stated he was at "Jasmine's house in Lansdale with Dan sometime last summer." Marche denied any involvement in the murder of Ebony Pack and stated he "was home all night" on the evening of November 28, 2020.

During his interview, Terrence Marche admitted that he had been inside Kings Shooter Supply gun store sometime in December 2020 to "look around." Marche is not permitted by law to purchase or possess a firearm. In addition, detectives determined bullets used in this homicide were specific to a 9 mm bullet produced by Kings Shooter Supply.

Detective William Mitchell, an expert in the field of Historical Call Detail Records Analysis, analyzed the cellphone records of Chong Dan, Ricky Vance, and Terrance Marche. Detective Mitchell found all three individuals' cellphones travel from different locations to the area of East Mount Airy/Germantown section of Philadelphia, PA just after 7:50 PM on November 28, 2020. This area is significant because Terra Ammons, one of Chong Dan's girlfriend resides on the 500 block of Mayland Street in this same section of Philadelphia, PA.

Specifically, Terrance Marche's cellphone(s) leave the area of his residence in King of Prussia, PA after 4:00 PM on November 28, 2020 and traveled to the **area** of Center City Philadelphia, PA and then traveled back to the area of his residence. At 6:54 PM, Marche's cellphone (267-694-3930) makes an outgoing call to Vance's cellphone for 19 seconds. After this call to Vance, Marche's cellphone left the area of his residence and traveled to the area of East Mount Airy/East Germantown sections of Philadelphia, PA which was the area of Dan's girlfriend's residence. There was a lack of voice or text activity for Marche's cellphone(s) until after the homicide occurred. At 10:25 PM, Marche's cellphone (267-694-3930) made an outgoing call to Vance's cellphone which lasted 29 seconds. Marche's cellphone (267-694-3930) then received an incoming call from Vance's cellphone at 10:26 PM lasting 37 seconds. Marche's cellphone (267-694-3930) was accessing cell sites just south of the previous cell sites in the area of East Mount Airy/East Germantown sections of Philadelphia, PA for these calls. Marche's phone then traveled in a southern direction towards the area of Vance's residence and made an outgoing call to Vance's cellphone at 10:54 PM but the call had no duration.

Ricky Vance's cellphone is in the area of his residence on North 31st Street in Philadelphia, PA, when his phone received the call from Marche's cellphone at 6:54 PM. Vance's cellphone then left the area of his residence on 31st Street and traveled to the area of East Mount Airy/East Germantown sections of Philadelphia, PA. Vance's cellphone made an outgoing call to Marche's cellphone at 7:53 PM for 23 seconds. Following that outgoing call there was no more outgoing activity for Vance's cellphone until after the homicide occurred. Vance's cellphone received several incoming voice calls between 7:53 PM and 8:20 PM which were directed to voicemail and one incoming text message which was unanswered. There was a period of voice and text inactivity from 8:20 PM until 10:15 PM. At 10:15 PM, Vance's cellphone received another **incoming call** which was routed to voicemail. The first answered activity for Vance's cellphone after the homicide was the incoming call from Marche's cellphone at 10:25 PM and the first outgoing activity for the cellphone was the call to Marche's cellphone at 10:26 PM. Vance's cellphone then traveled south to the area of his residence on 31st Street and was accessing a cell site in that area at 11:08 PM. The cellphone then traveled to the area of his other residence on Ruffner Street and was accessing a cell site in that area at 11:30 PM for an outgoing call to Marche's cellphone that lasted 11 seconds.

A total of 200 communications were found between Marche's cellphone (267-694-3930) and Vance's cellphone between from July 1, 2020 and March 11, 2021 with the last communication on this phone number being February 17, 2021. A total of 57 communications were found between Marche's 2nd cellphone (267-469-3129) during the same time period, most of which occurred after November 28, 2020, and the last being February 17, 2021. Vance also

had multiple contacts with Marche's second phone number of 267-469-3129 in the days before and after the homicide occurred.

Chong Dan's cellphone was accessing a cell site in the area of Cheltenham Township, Montgomery County, PA, at 4:38 PM and moved in a western direction towards the area of his girlfriend Terra Ammons' residence in the area of East Mount Airy/East Germantown sections of Philadelphia, PA. The cellphone remained in the area until just after 8:30 PM, last accessing a cell site in this area at 8:38 PM. The cellphone traveled in a southern direction and accessed a cell site in the area of 600 Righters Ferry Rd, Bala Cynwyd, PA at 8:48 PM. There was a large amount of texting activity that did not contain cell site information between 8:48 PM and 11:34 PM. At 11:34 PM, Chong Dan's cellphone was accessing a cell site in the area of Springdale, NJ.

In addition to cellphone records, Detective William Mitchell received records from Google in reference to Terrence Marche and Ricky Vance's cellphones. Google users have the option to track and store the location history of their cellular phone handset which is stored in Google's Sensorvault. Ricky Vance's Google account is listed under email rickgees68@gmail.com and Marche's Phone Number: +12676943930 [US] are listed under qaadirhuss@gmail.com and User Phone Numbers: +12674693129 [US] is listed under terrencemarche@gmail.com. Records were received for Vance's cellphone and Marche's cellphone number 267-694-3930.

An analysis of these records demonstrated Terrence Marche's cellphone traveled to the area of the victim's residence in Feasterville-Treose, PA on September 24, 2020 and September 25, 2020. After each trip, Marche's cellphone then traveled to the area of Dan's girlfriend Terra Ammons' residence in the East Mount Airy/East Germantown section of Philadelphia. Around the times Marche traveled to the area of the victim's residence, Marche's cellphone had multiple communications with Vance's cellphone.

On November 27, 2020, the night before the homicide, between 8:15 PM and 10:35 PM, both Vance and Marche's location history shows they traveled to the area of Clearview St and E Gorgas St in Philadelphia, PA. This location is in the same area of Dan's girlfriend Terra Ammon's residence in the East Mount Airy/East Germantown section of Philadelphia.

On the evening of the homicide, November 28, 2020, just after 7:00 PM, Vance's location history shows his cellphone traveled from the area of his residence to the area of Clearview St and E Gorgas Ln in Philadelphia, PA. During this same timeframe, Marche's cellphone left the area of his residence and traveled to the same location as Vance's cellphone. Both cellphones remained in the area of Clearview St and E Gorgas Ln during the time of the homicide and did not have any outgoing activity as previously described.

On November 28, 2020 between 7:06 PM and 7:39 PM, Chong Dan's cell site usage demonstrated his cellphone began using a cell site in the area of Terra Ammons' residence and ended using a cell site in the area where Marche and Vance's cellphones were located. This indicated that Chong's cellphone left the area of Terra Ammon's residence and traveled in a western direction towards the area where Marche and Vance's cellphones were located.

Just after the homicide and after outgoing communication resumed on Marche and Vance's cellphones at 10:25 PM and 10:26 PM, their Google location history indicated both phones traveled in a southern direction towards the area of Vance's residence. Vance's location history demonstrated his cellphone returned to his residence, and Marche's cellphone travels to the parking lot area of the Gillin Boathouse adjacent to the Schuylkill River, located in the 2200 block of Kelly Drive, Philadelphia. Marche's cellphone remained in the area from 10:41 PM to 10:51 PM and then traveled back to the area of Marche's residence in King of Prussia, PA.

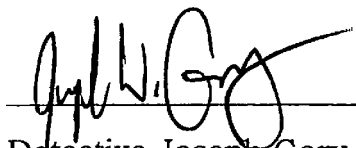
The day after the homicide, on November 29, 2020 at 4:09 PM, Vance's Google location history demonstrated his cellphone departed the area of his residence and traveled directly to the area of Marche's apartment in King of Prussia, PA, arriving at 4:42 PM. The cellphone remains in this area until 4:51 PM, when the location history shows the cellphone returned directly to the area of his residence in Philadelphia.

Based on his analysis of the cellphone records of Chong Dan, Ricky Vance and Terrance Marche and the Google location records of Ricky Vance and Terrance Marche, Detective Mitchell concluded that on November 28, 2020, prior to the homicide, all three individuals' cellphones traveled to the same area in East Mount Airy/East Germantown, not far from the residence of Dan's girlfriend. Vance and Marche's cellphones were in communication with each other just prior to when their cellphones began moving to that area. After arriving in East Mount Airy/East Germantown, Vance and Marche's cellphones had periods of outgoing voice and text inactivity and remained in the same location, near Gorgas & Clearview Street, during the crucial time of the homicide. Vance and Marche's cellphones only resumed voice and text activity after the homicide occurred. Both cellphones then moved in a southern direction. Vance's cellphone returned to the area of his residence. Marche's cellphone traveled to an area adjacent to the Schuylkill River and then returned to the area of his residence. After Marche's cellphone returned to his residence, Marche and Vance's cellphones again communicated with each other, briefly. On November 29, 2020, the day after the homicide, Vance traveled directly to the area of Marche's residence, stayed for a brief period of time, and then returned directly to the area of his residence.

During the week of May 17, 2021, Detectives learned that Terrance Marche departed the country for Honduras in Mid-April 2021 and "went missing." On Friday, May 21, 2021, Montgomery County Lieutenant Todd Richard and Detective Heather Long interviewed Twana Miller, Terrence Marche's fiancé. Twana Miller stated she drove Marche to the Philadelphia airport sometime in mid-April, 2021, believing he was flying to Miami. When they arrived at the airport, Marche then confided in Miller that he was really travelling to Honduras to meet Chong Dan, known to her as "Ling." Miller stated she spoke to Marche regularly while he was in Honduras until he suddenly stopped communicating with her on Sunday, May 16, 2021. Miller stated she received a phone call from Chong Dan on Wednesday, May 19, 2021. During that call, Dan informed Miller that Marche went missing and he was returning to the United States without Marche.

A criminal history check on Terrence Marche indicated he was arrested on August 22, 1996 and charged federally for Conspiracy to Commit Bank Robbery and Armed Bank Robbery, Use of a Firearm During Crime of Violence and plead guilty to Armed Robbery of Federal Savings Institution on November 5, 1997. Marche was sentenced to one hundred and eighty-eight (188) months in federal custody. Based on this conviction, Marche is precluded from possessing, owning or purchasing a firearm in the Commonwealth of Pennsylvania.

Based on the aforementioned facts, your Affiants' respectfully request an arrest warrant be issued to Terrence Marche for Murder of the First Degree, Conspiracy to Commit Murder of the First Degree and related charges enumerated on the Criminal Complaint.



Detective Joseph Gary
Lansdale Borough Police Department

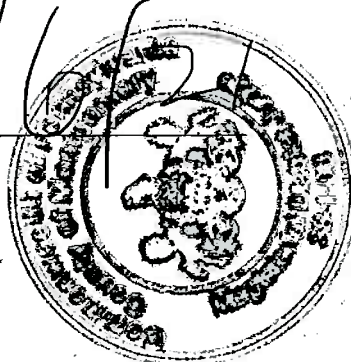


Detective John Wittenberger
Montgomery County Detectives



ISSUING AUTHORITY

8/16/21



DATE

CONFIDENTIAL

Confidential Information Form Criminal Complaint

Complete the defendant's SSN information if known. If this form is submitted as part of a Police Criminal Complaint, the NCIC Cautions/Medical Conditions and Scars/Marks/Tattoos sections should also be completed if known.

Docket Number:	Date Filed: 8 / 6 / 2021	OTN/LiveScan Number (LiveScan number preferred)	Complaint/Incident Number 20-16532
Defendant Name	First: Terrence	Middle: M	Last: Marche

NCIC Cautions and Medical Conditions (check up to 9)				
<input type="checkbox"/> 00	<input type="checkbox"/> 20	<input type="checkbox"/> 50	<input type="checkbox"/> 70	<input type="checkbox"/> 01
<input type="checkbox"/> 05	<input type="checkbox"/> 25	<input type="checkbox"/> 55	<input type="checkbox"/> 80	
<input type="checkbox"/> 10	<input type="checkbox"/> 30	<input type="checkbox"/> 60	<input type="checkbox"/> 85	
<input type="checkbox"/> 15	<input type="checkbox"/> 40	<input type="checkbox"/> 65	<input type="checkbox"/> 90	

Scars, Marks, Tattoos (NCIC Codes)	
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Pursuant to the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania*, the Confidential Information Form shall accompany a filing where confidential information is required by law, ordered by the court, or otherwise necessary to effect the disposition of a matter. This form, and any additional pages, shall remain confidential, except that it shall be available to the parties, counsel of record, the court, and the custodian. This form, and any additional pages, must be served on all unrepresented parties and counsel of record.

This Information Pertains to:	Confidential Information:	Reference in Filing:
Terrence M. Marche (full name of adult) OR This information pertains to a minor with the initials of _____ and the full name of _____ (full name of minor) and date of birth: _____	Social Security Number (SSN): 190-58-0472 Financial Account Number (FAN): _____ Driver License Number (DLN): 23307488 State of Issuance (DLN): PA Expires (DLN): 12/29/2024 State Identification Number (SID): 19962351	Alternate Reference: SSN1 Alternate Reference: FAN1 Alternate Reference: DLN1 Alternate Reference: SID1

Additional page(s) attached. 1 total pages are attached to this filing.

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Signature of Attorney or Affiant _____

Date _____

Name: _____

Attorney Number: (if applicable) _____

Address: _____

Telephone: _____

Email: _____

NOTE: Parties and attorney of record in a case will have access to this Confidential Information Form. Confidentiality of this information must be maintained.

CONFIDENTIAL